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February 3, 1992

Mr. Martin Hestmark
U.S. Environmental Protection Agency
Region VIII
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

RE: Technical Memorandum 1 - Revisions to Final Phase I RFI/RI
Workplan for OU 5

Dear Mr. Hestmark,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document prepared by DOE and it's prime operating contractor, EG&G. Our comments are attached.

The Division recommends conditional approval both for this document and the Phase I RFI/RI Workplan for OU 5 with a requirement that the following conditions are met:

- A conceptual model diagram is added to Section 2.
- Section 7.2.1 is modified to reflect the changes indicated in the attached comments. This includes addition of text defining the goals of the Phase I and Phase II investigations of the Old Landfill, revising the "Stage 1-6" subsections, and adding BAT sampler surveys (or an equivalent) to the cone penetrometer survey locations.
- Section 7.2.2 is modified to reflect the changes indicated in the attached comments.
- Revision of Tables 7-1, 7-2, and 7-7 to reflect the changes indicated in the attached comments.
- Revision of Figures 7-1, 7-3, and 7-4 to reflect the changes indicated in the attached comments.

We suggest that the revised portions be submitted in loose-leaf

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fashion so that they can be incorporated into the original workplan by simply replacing pages. We further suggest that after these conditions are met and the Phase I RFI/RI Workplan is fully approved, Technical Memorandum 1 be rescinded. Resubmission of the disapproved portions of this, or any, workplan should not constitute a "technical memorandum." In order to be easily and effectively implemented in the field, a workplan should be free of attachments that need to be cross-referenced.

The Division suggests a February 28, 1992 deadline be imposed on satisfying the remaining requirements.

It is our intention that conditional approval be granted so that DOE and EG&G can proceed immediately with contracting and workplan implementation. The conditional requirements of resubmission can be met while progress is being made.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,



Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc: Frazer Lockhart, DOE
Jen Pepe, DOE
Paul Bunge, EG&G
Tom Ottensman, EG&G
Barbara Barry, RFPD